

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 11-10212-JLT</b>
	)	
<b>1. JOHN WILLIS</b>	)	
<b>a/k/a "Bac Guai John"</b>	)	
<b>2. BRANT WELTY</b>	)	
<b>3. PETER MELENDEZ</b>	)	
<b>a/k/a "Shrek"</b>	)	
<b>4. AIBUN ENG</b>	)	
<b>5. BRIAN BOWES</b>	)	
<b>6. KEVIN BARANOWSKI</b>	)	
<b>7. MICHAEL CLEMENTE</b>	)	
<b>a/k/a "Ricky Martin"</b>	)	
<b>8. MICHAEL SHAW</b>	)	
<b>9. MARK THOMPSON</b>	)	
<b>10. STEVEN LE a/k/a "Little Stevie"</b>	)	
<b>11. VINCENT ALBERICO</b>	)	
<b>12. BRIDGET WELTY</b>	)	
<b>13. ANEVAY DUFFY</b>	)	
<b>a/k/a "Homegirl"</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT STATUS REPORT**

Pursuant to Local Rule 116.5(A), the United States of America and the defendant submit this joint status report in advance of the Initial Status Conference scheduled for July 25, 2011.

**1. Local Rule 116.3 Timing Requirements**

The parties are not requesting relief from the timing requirements of Local Rule 116.3.

**2. Expert Discovery**

The majority of counsel agree to the following proposal: the government anticipates that, unless there is a stipulation regarding the drugs seized in this case, it will offer expert testimony regarding the composition and amount of the drug exhibits in this case. The government may

offer expert witness testimony regarding the operation of drug conspiracies as well. In the event the government offers expert testimony, it will afford defendant timely notice of same, not less than 21 days before trial.

Counsel for defendants Brant Welty, Kevin Baranowski, Mark Thompson, and Bridget Welty request, pursuant to Fed. R. Crim. P. 16(a)(1)(G), that the government “give to the defendant a written summary of any testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief during trial.”

Defendants’ request includes government testimony based on expert or specialized knowledge of the operation of drug conspiracies and the vocabulary and speech habits of illegal narcotics traffickers. Defendants request that this information be produced within 90 days of the date of entry of this order. The government does not assent to a request to produce expert discovery within 90 days.

### 3. Additional Discovery

The government has produced initial automatic discovery to each of the defendants and has made the Title III recordings available to counsel. The government will supplement the initial discovery with materials as they are received by the government, including discovery regarding the related cases of United States v. Minh Cam Luong, et al., Cr. No. 11-10251-PBS, and United States v. Wei Xing Chen, Cr. No. 11-10252-NMG. The defendants reserve the right to file for additional discovery in response to the government’s productions.

### 4. Motion Date

Defense counsel request additional time to review the discovery produced by the government prior to determining whether to file any dispositive motions. Accordingly, the parties request an interim status conference date, prior to the Final Status Conference, at which

point a motion date may be set. The parties jointly request that the time from the Initial Status Conference and the interim status conference be excluded from Speedy Trial Act calculations. Exclusion of this time will allow the parties to review voluminous discovery and to explore disposition of this case short of trial and is in the interests of justice.

5. Speedy Trial Act Calculations

The parties have conferred on the periods excludable from all Speedy Trial Act calculations. On July 7, 2011, the Court entered four separate orders, covering all defendants, excluding the time from the defendants' initial appearances through July 25, 2011. Accordingly, zero days have been counted and 70 days remain under the Speedy Trial Act.

6. Anticipated Trial

The parties believe that it is too early to determine whether a trial in this matter will be required. The United States estimates that, as the case is currently constituted, a trial would last three to four weeks.

7. Interim Status Conference

The parties request that an interim status conference be scheduled on a date convenient for the court.

Respectfully submitted,

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R. Bradford Bailey  
Counsel for John Willis

BRANT WELTY

By: Kevin L. Barron  
Kevin Barron  
Counsel for Brant Welty

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BRIDGET WELTY

By: Mark D. Smith

Mark D. Smith

Counsel for Bridget Welty

Dated: July 25, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Timothy E. Moran  
Timothy E. Moran